

INSURANCE INSTITUTE FOR HIGHWAY SAFETY

August 11, 2003

The Honorable Jeffrey W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Initiatives to Address Vehicle Compatibility Docket No. NHTSA 2003-14623, Notice 1

Dear Dr. Runge:

The National Highway Traffic Safety Administration (NHTSA) has asked for comments on its proposed initiatives for improving vehicle compatibility. The Insurance Institute for Highway Safety is pleased the agency is addressing this issue and offers the following comments on the proposed initiatives.

Vehicle Strategies

Partner protection: The Institute strongly supports efforts to improve the alignment of vehicles' crash-energy-absorbing structures and believes this should be NHTSA's highest priority for front-to-front crash compatibility. Only after vehicle structures are aligned can the benefits of other strategies, such as stiffness balancing, be realized. The Institute cautions NHTSA that metrics such as height of force address only the vertical alignment of vehicle structure and not the horizontal distribution of forces. Frontal crashes that involve only a portion of a vehicle's front end are common, and thus horizontal force distribution also must be considered.

Self-protection: The Institute agrees that the most significant improvement for side impact compatibility is self-protection for occupants of side-struck vehicles. However, we strongly favor testing with a mobile barrier that represents a sport utility vehicle (SUV) or pickup rather than testing with a narrow pole. Although a pole test will drive the installation of head protection systems, it will not necessarily drive systems that adequately protect occupants when struck by vehicles with higher ride heights, such as SUVs or pickups. The front ends of SUVs and pickups typically override the doorsills of most passenger vehicles in side impacts. Airbag systems tuned for a pole test may not sense these impacts and either not deploy or deploy late. In addition, airbags designed to work well in pole crashes may be too dependent on the uniform vertical reaction surface of the pole to keep the airbag properly positioned, a condition that is unlikely to occur in vehicle-to-vehicle impacts.

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Lighting/glare: The Institute applauds NHTSA's efforts to reduce glare and better align the lighting of vehicles sharing the nation's roads.

Reform CAFE: The Institute favors reforming regulations that inadvertently drive manufacturers to produce "incompatible" vehicles and encourage consumers to purchase such vehicles. The Institute anticipates the opportunity to submit comments in response to NHTSA's upcoming advance notice of proposed rulemaking seeking alternative approaches for reforming the structure of the CAFE program.

Roadway Strategies

The Institute supports NHTSA's efforts to ensure that roadside hardware has good structural engagement with a broad range of vehicles.

Behavioral Strategies

The Institute strongly cautions NHTSA about using compatibility and/or aggressivity metrics to influence consumers' purchasing decisions, as it may have perverse effects. Although some consumers may choose vehicles that are more compatible or less aggressive, there are indications that some people equate "aggressive" with safety for themselves.

Sincerely,



Adrian K. Lund, Ph.D.
Chief Operating Officer

cc: Docket Clerk, Docket No. NHTSA 2003-14623, Notice 1